



February 26, 2019

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

**RE: EB Docket No. 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification Filing for
OTZ Telephone Cooperative, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of OTZ Telephone Cooperative, Inc. (499 Filer ID No. 814651) covering 2018 along with the accompanying Statement of Compliance and Procedures.

Should you have any questions or need further information, please contact me at (918) 376-9901 or dion@alexicon.net if you have any questions.

Sincerely,

Dion Nero
Authorized Representative for
OTZ Telephone Cooperative, Inc.

DN/rs
Attachment

cc: Doug Neal, OTZ Telephone Cooperative, Inc.

Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 26, 2019
2. Name of company(s) covered by this certification: OTZ Telephone Cooperative, Inc.
3. Form 499 Filer ID: 814651
4. Name of signatory: Doug Neal
5. Title of signatory: General Manager
6. Certification:

I, Doug Neal, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 CFR § 64.2001 *et seq.*

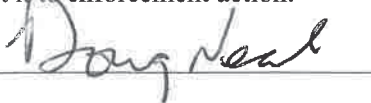
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Statement of CPNI Compliance and Procedures

OTZ Telephone Cooperative, Inc.
STATEMENT OF COMPLIANCE and PROCEDURES
For the Year Ending 2018
Form 499 Filer ID: 814651

This accompanying statement explains how the operating procedures of OTZ Telephone Cooperative, Inc. ("OTZ" or "the Cooperative") are in compliance with the rules governing CPNI as found in Subpart U - Customer Proprietary Network Information - Part 64 of Title 47 of the Code of Federal Regulations and as referenced within the Cooperative's 2015 Annual CPNI Certification.

OTZ adheres to all CPNI rules as stated in 47 C.F.R. §§ 64.200 I - 64.2011 concerning the proper use of a customer's **CPNI**. Specifically, this statement for use of CPNI meets all the requirements as listed in 47 C.F.R. § 64.2008. To further protect the customer's privacy, all the safeguards required by 47 C.F.R. § 64.2009 have been implemented. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of the Cooperative's, and the Cooperative's affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of an annual certification by a corporate officer with personal knowledge of the Cooperative's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification to the Federal Communications Commission of any instance where opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly.

OTZ has its updated CPNI Manual available on file at its business office for further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.